

Daniel F. Pfeifer  
 Richard W. Morgan  
 Jeffrey J. Stesiak  
 Douglas E. Sakaguchi  
 Jerome W. McKeever  
*\*Board Certified Trial Advocate*  
 Kenneth P. Fedder  
*of Counsel*

# Pfeifer, Morgan & Stesiak

ATTORNEYS AT LAW

RECEIVED

Kathy J. Spedgrass  
 Susan M. Seagrove  
 Sherry A. Money  
 Julia I. Cuson  
*Paralegals*

JUN 14 2012

June 11, 2012

**CERTIFIED MAIL**  
**Return Receipt Requested**

Indiana Political Subdivision  
 Risk Management Commission  
 311 West Washington St., Suite 300  
 Indianapolis, IN 46204

Pete Buttigieg, Mayor  
 City of South Bend  
 227 W. Jefferson Boulevard  
 South Bend, IN 46601

RE: Timothy Corbett

To Whom It May Concern:

Our law firm represents Timothy Corbett relating to damages and injuries sustained as a result of the South Bend Police Department, under the direction of Chief Darryl Boykins illegally wire-tapped telephonic communications for an undetermined period of time. The claimant became aware of the illegal wire-tap when the same was disclosed on January 6, 2012.

The purpose of this letter is to give you formal notice of this claim pursuant to Indiana Code 34-13-3-8. We contend that the damages sustained by Timothy Corbett were the result of the phone lines being illegally wire-tapped by Police Chief Boykins.

INJURED PARTIES:	Timothy Corbett 523 E. Jefferson Boulevard South Bend, IN 46617
PERSONS MAKING CLAIM:	Timothy Corbett
DATE OF LOSS:	January 6, 2012
PLACE OF LOSS:	South Bend Police Department 701 W. Sample Street South Bend, IN 46601

RECEIVED  
 JUN 13 2012  
 OFFICE OF THE MAYOR  
 CITY OF SOUTHBEND

WITNESSES/NAMES OF  
PERSONS INVOLVED:

Timothy Corbett, Steve Richmond,  
Dave Wells, Brian Young, Sandy Young  
Diana Scott, Karen DePaepe, Darryl Boykins

**STATEMENT OF FACTS UPON WHICH CLAIM IS BASED**

The claimant learned on January 6, 2012 that the South Bend Police Department, under the direction of Chief Darryl Boykins, was illegally wire-tapping telephone lines and recording certain conversations of the claimant in violation of the laws of the State of Indiana and the laws of the United States Code.

**EXTENT OF LOSS**

Timothy Corbett sustained damages pursuant to State and Federal statutes. He also sustained damage to his reputation resulting in a hostile work environment.

**THE AMOUNT OF DAMAGES SOUGHT**

Timothy Corbett seeks damages, for each and every violation, in an amount adequate to compensate him for his losses, as well as damages provided by State and Federal statutes; said amount sought is not to exceed the statutory limit, for each and every violation.

Please contact the undersigned upon receipt of this letter so that we may discuss this claim. I appreciate you giving this claim your immediate attention. If I do not hear from you within ninety (90) days from the date of this letter, I will presume that the claim has been denied and we will proceed with the filing of a lawsuit as allowed by the Indiana Tort Claims Act.

Respectfully submitted,



Daniel H. Pfeifer  
Jeffrey J. Stesiak

JJS/sbj

cc: Timothy Corbett

Daniel H. Pfeifer\*  
Richard W. Morgan  
Jeffrey J. Stesiak  
Douglas E. Sakaguchi  
Jerome W. McKeever  
\*Board Certified Trial Advocate  
Kenneth P. Fedder  
of Counsel

# Pfeifer, Morgan & Stesiak

ATTORNEYS AT LAW

Kristen M. Griffin  
Susan M. Seagrove  
Sherry A. Money  
Julia I. Cuson  
Paralegals

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227 W. Jefferson Boulevard  
South Bend, IN 46601

RE: Steve Richmond

To Whom It May Concern:

Our law firm represents Steve Richmond relating to damages and injuries sustained as a result of the South Bend Police Department, under the direction of Chief Darryl Boykins illegally wire-tapped telephonic communications for an undetermined period of time. The claimant became aware of the illegal wire-tap when the same was disclosed on January 6, 2012.

The purpose of this letter is to give you formal notice of this claim pursuant to Indiana Code 34-13-3-8. We contend that the damages sustained by Steve Richmond were the result of the phone lines being illegally wire-tapped by Police Chief Boykins.

**INJURED PARTIES:**

Steve Richmond  
701 W. Sample Street  
South Bend, IN 46601

**PERSONS MAKING CLAIM:**

Steve Richmond

**DATE OF LOSS:**

January 6, 2012

**PLACE OF LOSS:**

South Bend Police Department  
701 W. Sample Street  
South Bend, IN 46601

WITNESSES/NAMES OF  
PERSONS INVOLVED:

Timothy Corbett, Steve Richmond,  
Dave Wells, Brian Young, Sandy Young  
Diana Scott, Karen DePaepe, Darryl Boykins

**STATEMENT OF FACTS UPON WHICH CLAIM IS BASED**

The claimant learned on January 6, 2012 that the South Bend Police Department, under the direction of Chief Darryl Boykins, was illegally wire-tapping telephone lines and recording certain conversations of the claimant in violation of the laws of the State of Indiana and the laws of the United States Code.

**EXTENT OF LOSS**

Steve Richmond sustained damages pursuant to State and Federal statutes. He also sustained damage to his reputation resulting in a hostile work environment.

**THE AMOUNT OF DAMAGES SOUGHT**

Steve Richmond seeks damages, for each and every violation, in an amount adequate to compensate him for his losses, as well as damages provided by State and Federal statutes; said amount sought is not to exceed the statutory limit, for each and every violation.

Please contact the undersigned upon receipt of this letter so that we may discuss this claim. I appreciate you giving this claim your immediate attention. If I do not hear from you within ninety (90) days from the date of this letter, I will presume that the claim has been denied and we will proceed with the filing of a lawsuit as allowed by the Indiana Tort Claims Act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel H. Pfeifer", with a circled "DP" or similar initials to the right.

Daniel H. Pfeifer  
Jeffrey J. Stesiak

JJS/sbj

cc: Steve Richmond

Daniel H. Pfeifer\*

Richard W. Morgan

Jeffrey J. Stesiak

Douglas E. Sakaguchi

Jerome W. McKeever

\*Board Certified Trial Advocate

Kenneth P. Fedder  
of Counsel

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Pete Buttigieg, Mayor  
City of South Bend  
227 W. Jefferson Boulevard  
South Bend, IN 46601

RE: Brian Young & Sandy Young

To Whom It May Concern:

Our law firm represents Brian Young & Sandy Young relating to damages and injuries sustained as a result of the South Bend Police Department, under the direction of Chief Darryl Boykins illegally wire-tapped telephonic communications for an undetermined period of time. The claimants became aware of the illegal wire-tap when the same was disclosed on January 6, 2012.

The purpose of this letter is to give you formal notice of this claim pursuant to Indiana Code 34-13-3-8. We contend that the damages sustained by Brian Young & Sandy Young were the result of the phone lines being illegally wire-tapped by Police Chief Boykins.

INJURED PARTIES:

Brian Young & Sandy Young  
701 W. Sample Street  
South Bend, IN 46601

PERSONS MAKING CLAIM:

Brian Young & Sandy Young

DATE OF LOSS:

January 6, 2012

PLACE OF LOSS:

South Bend Police Department  
701 W. Sample Street  
South Bend, IN 46601

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OFFICE OF THE MAYOR  
CITY OF SOUTH BEND

WITNESSES/NAMES OF  
PERSONS INVOLVED:

Timothy Corbett, Steve Richmond,  
Dave Wells, Brian Young, Sandy Young  
Diana Scott, Karen DePaepe, Darryl Boykins

**STATEMENT OF FACTS UPON WHICH CLAIM IS BASED**

The claimant learned on January 6, 2012 that the South Bend Police Department, under the direction of Chief Darryl Boykins, was illegally wire-tapping telephone lines and recording certain conversations of the claimant in violation of the laws of the State of Indiana and the laws of the United States Code.

**EXTENT OF LOSS**

Brian Young sustained damages pursuant to State and Federal statutes. He also sustained damage to his reputation resulting in a hostile work environment.

Sandy Young sustained damages, including invasion of her privacy.

**THE AMOUNT OF DAMAGES SOUGHT**

Brian Young and Sandy Young seek damages, for each and every violation, in an amount adequate to compensate them for their losses, as well as damages provided by State and Federal statutes; said amount sought is not to exceed the statutory limit, for each and every violation.

Please contact the undersigned upon receipt of this letter so that we may discuss this claim. I appreciate you giving this claim your immediate attention. If I do not hear from you within ninety (90) days from the date of this letter, I will presume that the claim has been denied and we will proceed with the filing of a lawsuit as allowed by the Indiana Tort Claims Act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel H. Pfeifer", followed by a small circular stamp containing the letters "JJS".

Daniel H. Pfeifer  
Jeffrey J. Stesiak

JJS/sbj

cc: Brian Young & Sandy Young

Daniel H. Pfeifer\*  
 Richard W. Morgan  
 Jeffrey J. Stesiak  
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 227 W. Jefferson Boulevard  
 South Bend, IN 46601

RE: Dave Wells

To Whom It May Concern:

Our law firm represents Dave Wells relating to damages and injuries sustained as a result of the South Bend Police Department, under the direction of Chief Darryl Boykins illegally wire-tapped telephonic communications for an undetermined period of time. The claimant became aware of the illegal wire-tap when the same was disclosed on January 6, 2012.

The purpose of this letter is to give you formal notice of this claim pursuant to Indiana Code 34-13-3-8. We contend that the damages sustained by Dave Wells were the result of the phone lines being illegally wire-tapped by Police Chief Boykins.

INJURED PARTIES:

Dave Wells  
 523 E. Jefferson Boulevard  
 South Bend, IN 46617

PERSONS MAKING CLAIM:

Dave Wells

DATE OF LOSS:

January 6, 2012

PLACE OF LOSS:

South Bend Police Department  
 701 W. Sample Street  
 South Bend, IN 46601

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 CITY OF SOUTH BEND



WITNESSES/NAMES OF  
PERSONS INVOLVED:

Timothy Corbett, Steve Richmond,  
Dave Wells, Brian Young, Sandy Young  
Diana Scott, Karen DePaepe, Darryl Boykins

**STATEMENT OF FACTS UPON WHICH CLAIM IS BASED**

The claimant learned on January 6, 2012 that the South Bend Police Department, under the direction of Chief Darryl Boykins, was illegally wire-tapping telephone lines and recording certain conversations of the claimant in violation of the laws of the State of Indiana and the laws of the United States Code.

**EXTENT OF LOSS**

Dave Wells sustained damages pursuant to State and Federal statutes. He also sustained damage to his reputation resulting in a hostile work environment.

**THE AMOUNT OF DAMAGES SOUGHT**

Dave Wells seeks damages, for each and every violation, in an amount adequate to compensate him for his losses, as well as damages provided by State and Federal statutes; said amount sought is not to exceed the statutory limit, for each and every violation.

Please contact the undersigned upon receipt of this letter so that we may discuss this claim. I appreciate you giving this claim your immediate attention. If I do not hear from you within ninety (90) days from the date of this letter, I will presume that the claim has been denied and we will proceed with the filing of a lawsuit as allowed by the Indiana Tort Claims Act.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel H. Pfeifer", with a circled "881" to the right.

Daniel H. Pfeifer  
Jeffrey J. Stesiak

JJS/sbj

cc: Dave Wells